

FILED (3)

AUG 18 2021

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

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PD  
IJJ

1 Your name: Neal Evan Price

2 Address: P.O. Box 64479, Gary, IN 46401

3 Phone Number: 708-510-2016

4 E-mail Address: Sonriseoperations@yahoo.com

5 Pro Se [Select one: Plaintiff or Defendant]

6 UNITED STATES DISTRICT COURT

7 NORTHERN DISTRICT OF CALIFORNIA

8 [Select one location: San Francisco / Oakland / San Jose / Eureka]

9 C 21-06370

DMR

10 Neal Evan Price ) Case Number: \_\_\_\_\_

11 Plaintiff(s), )

12 vs. ) Title of Document: \_\_\_\_\_

13 Kenneth Thomas aka Kenneth Charles )

14 Thomas Jr aka "Life of a Grandmaster Troll" )

15 on YouTube aka "Grandmaster Troll Racing" )

16 on YouTube aka "Grandmaster Troll )

17 Officiating" aka "Grandmaster Troll Money" )

18 Defendant(s). )

19 )

20 )

21 **Introduction**

22 1. This is an action for relief from violations by Kenneth Thomas of the right of the Plaintiff  
23 Neal Price's right to be free from public defamation, libel, and slander.

24 2. The Plaintiff has a Sole Proprietorship Content Business/ Personal Brand on YouTube  
25 which operates under the pen name "Ramil Amyr" and the Defendant has multiple  
26 YouTube Channels operating under various names however the violation occurred under  
27 the channel called "Life of a Grandmaster Troll."

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1       3. Defendant Kenneth Thomas, on the night of August 15, 2021 at 9:30pm Central produced  
2       a livestream on YouTube where he claimed the Plaintiff Neal Price aka Ramil Amyr was  
3       “Pimping Under Age Girls”, that the Plaintiff has kids (which the Plaintiff does not), that  
4       the plaintiff is running a “whore house” and even suggest that the Plaintiff had romantic  
5       relationships with underage girls. The Defendant used the Plaintiff’s government name as  
6       well as pen name for these false allegations. The URL for this livestream is  
7       [https://youtu.be/kUWa7\\_1B2fo](https://youtu.be/kUWa7_1B2fo). The Plaintiff has also retained a copy of the livestream  
8       as well.  
9       4. These claims are not accurate and because of the nature of the inaccurate claims damages  
10      that can not be reversed has occurred.

#### **JURISDICTION AND VENUE**

12      This court has jurisdiction because of 28 U.S. code Section 1332. “Diversity of  
13      citizenship” gives this court jurisdiction. The Plaintiff Neal Price is a citizen of Indiana  
14      and the Defendant is a citizen of California. The amount in controversy exceeds the sum  
15      of \$75,000.

#### **NATURE OF THIS ACTION**

17      5. This action is brought pursuant to New York Times Co. v. Sullivan, 376 U.S. 254, Civ.  
18      Code § 45, and Civ. Code § 46.  
19      6. Plaintiff seeks injunctive and declaratory relief, compensatory damages, punitive  
20      damages, for the defendant’s violation of the Plaintiff’s Federal, Statutory, and common  
21      law rights.

#### **STATEMENT OF FACTS**

23      7. On August 15<sup>th</sup>, 2021 at 9:30pm Central Time Kenneth Thomas produced a live on his  
24      channel called “Ramil Amyr aka Neal Price Exposed! Pimping Under Age Girls what it  
25      means for the Manosphere!!.” This is where the Libel occurs. In this title that the  
26      Defendant wrote for his livestream he is already making false claims and lies to the  
27      public.  
28

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1       8. The Plaintiff Neal Price was charged with Promoting Juvenile Prostitution with the  
2       alleged victim being 17 and Promoting Prostitution in which another woman was 19 in  
3       Cook County, IL in July 2013. The Promoting Juvenile Prostitution charge was dismissed  
4       and the Defendant was aware of this. The Plaintiff also denied this claim vehemently  
5       multiple times. The Plaintiff never or was never convicted of "Pimping an Underage  
6       Girl." The Plaintiff was only convicted of Promoting Prostitution to where the woman  
7       was an adult age 19.

8       9. The Defendant had the information to put out the correct information but instead decided  
9       to twist a narrative with malice in order to destroy the credibility and reputation of the  
10       Plaintiff and his business.

11       10. The Defendant then proceeds throughout the livestream to say that the Plaintiff was  
12       pimping underage girls multiple times and even insists that the Plaintiff had other  
13       underage girls that he pimped. Again these claims are false.

14       11. At the 36 minute mark the Defendant then goes to claim that the Plaintiff has kids and  
15       takes a clip from a Plaintiff's previous produced livestream out of context to back it up.  
16       The Plaintiff does not have any kids, biological or adopted. This is damaging because the  
17       Plaintiff's brand is based on men being single and childless while focusing on economics  
18       and self fulfillment.

19       12. At the 1 Hour and 9 minute mark the Defendant then claims that the Plaintiff is using a  
20       Real Estate business to make "whore houses". This statement is also false and also  
21       damaging for clear reasons.

22       13. At the 1:34:55 mark the Defendant then goes to insinuate that the Plaintiff had a romantic  
23       relationship with an underage girl by drawing conclusions based on meritless claims.  
24       These accusations are damaging for clear and convincing reasons.

25       **PRAYER FOR RELIEF**

26       14. The serious nature of the defamation from the Defendant violated the Plaintiff's rights to  
27       be free from public defamation, libel, and slander. The Plaintiff asks for injunctive and

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1 declaratory relief, compensatory damages, punitive damages, for the defendant's  
2 violation of the Plaintiff's Federal, Statutory and common law rights.

3 15. For the injunctive relief the Plaintiff asks that the court order the Defendant to not publish  
4 inaccurate statements about the Plaintiff in perpetuity. Also the Plaintiff asks that the  
5 court order the Defendant to cease publishing any further work about the Plaintiff on any  
6 medium that exists.

7 16. The Plaintiff asks for \$50,000 in declaratory relief because of the serious nature of the  
8 false claims made by the Defendant.

9 17. The Plaintiff asks for \$100,000 in compensatory damages. The Defendant should be  
10 liable for possible earnings loss as a result of the defamation that occurred on his  
11 produced livestream.

12 18. The Plaintiff asks for \$200,000 punitive damages to deter future defamation from the  
13 Defendant.

14 19. The Plaintiff also asks for such other and further relief as this Court deems just and  
15 proper.

16  
17 Dated: August 18, 2021

Respectfully submitted,

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19 Neal Price  
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28 Pro Se Litigant



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**JURY DEMAND**

Plaintiff hereby demands a jury trial in the within-entitled action.

Dated: August 18, 2021

Respectfully submitted,

Neal Price

Pro Se Litigant



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